

First, the MPEP clearly states that if a proposed modification or combination of prior art would change the principle operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious (see MPEP 2143.01(VI)). In the present case, if Dolin and Richardson were to be combined as suggested by the Examiner, Dolin's process would not be needed and therefore the combination would clearly change principle operation of Dolin's invention. To this end, Dolin recognizes that it may be important that the physical location of a switch 105 to control a light 101 be near the light (see col. 3, lines 51-62). Here, instead of providing a general rule set regarding relative positions of resources that need to communicate (e.g., a switch and a light), Dolin relies on general knowledge of a system configurer applied during a configuration process to overcome the problem of specifying communication between improperly positioned resources. In Dolin, during system configuration, as devices (e.g., a light, a switch, etc.) are physically installed in a facility, tags identifying the devices are applied to a paper copy of the facility floor plan. Thereafter, the tags are read from the paper plan and are associated with specific positions in the facility via selection of specific positions on an electronic version of the floor plan. Next, while viewing the electronic version of the floor plan that includes a spatial representation of resources/devices within the facility, devices that will communicate with each other (e.g., a switch may be associated with a light) are selected by the configurer and associated via the electronic floor plan.

Thus, in Dolin, the configurer applies general knowledge about which switch should be used to control a light based on the spatial relationship of the switch and the light on the electronic display screen. If there were a rule set indicating probable resource positions as well as a way to automatically compare actual resource positions to the rule set, Dolin's entire process would not be needed. Instead, the configurer could simply configure Dolin's system without tags and without a paper copy and could specify communication between a switch and a light without much care as to relative juxtapositions and then the system could simply identify any portion of the configuration

inconsistent with the rule set. In effect, Dolin's entire process would not be needed. Based on the MPEP section cited above, because combining Richardson with Dolin as suggested by the Examiner would change the principle operation of Dolin, the combination cannot render the claims of the present application obvious.

Second, each of pending independent claims 54, 63 and 65 in this application requires, among other things, a method for validating likely correct resource communications. Neither Dolin nor Richardson teaches or suggests a method to validate likely correct resource communications. To this end, as indicated in the most recent response to Office Action, Richardson teaches a controller that controls a printing system where all printer components are linked to the controller and there is no concept of incorrect linkage or invalid communications. Dolin teaches a system for specifying communications between system components and once specified, there is no additional process that calls for verification of validity of resource communications. Thus, because neither reference teaches or suggests a process for validating likely correct resource communications, not surprisingly, the combination of Dolin and Richardson cannot teach or suggest this purpose.

Third, the Office Action cobbles together different steps from two references (Dolin and Richardson) that are in completely different fields of art in an impermissible manner. In this regard, Dolin is related to configuring resources while Richardson is related to controlling resources that move with respect to each other to perform a process. In Dolin, as explained above, resources are stationary once positioned and the positions are only used during a commissioning process to associate resources together for control purposes. In contrast, Richardson's resources move during performance of a process and their positions need to be known as fundamental inputs to the process being performed. Combining the teachings of Richardson regarding position determination during a dynamic process with those of Dolin where resources are stationary is absurd at best.

The above comments are applicable to each of claims 54, 63 and 65 and claims

that depend there from.

4A. Applicant is clear that Dolin fails to teach or even remotely suggest the step of providing a rule set including rules that indicate probable relative resource positions. In this regard, Dolin teaches that a user specify actual resource positions with respect to a facility, not probable relative positions of resources with respect to each other. Regarding Dolin's col. 7, lines 32-65, Dolin teaches that node subsets can be predetermined such as devices operating in a particular area or room, etc. Here, where node groups are predefined, the predetermined groups simply operate as a way to categorize a subset of nodes and have nothing to do with probable relative resource positions. For example, in Dolin, where a facility includes several rooms including a first room, it is possible that one, ten, five, etc., lights may be placed in the first room and those lights can be grouped together and associated as a group with the room. Here, various numbers of lights may be placed in the room so that lights in the room are possible but there is no suggestion about probabilities. In other words, in Dolin it is just as likely that one light will be placed in a room as it is that twenty lights will be placed in the room and there are no rules regarding probabilities of positions.

4B. While Richardson may teach readjustment of the position of a resource that is not in a desired position, again, it makes no sense to combine the teachings of Richardson with Dolin where Dolin's resources are purposefully placed at their actual positions by a configurer and the configurer is applying his own general knowledge to confirm that the resources are correctly positioned. In short, in Dolin all positions are possible (probabilities are not contemplated) and therefore it would make no sense to add a step whereby actual positions are compared with relative positions specified by a rule set as the rule set includes all positions.

For at least the above reasons Applicant believes claim 54 and claims that

depend there from are patentable over the cited references and requests that the current rejection be withdrawn.

4G. Claim 59 requires that the entire process of claim 54 be performed in real time as resources are added to the resource subset. Richardson teaches a system that is completely configured and fails to teach or suggest that additional resources are added to the system or that if resources are added, that locations are compared in real time to probable positions specified by rules. Dolin also fails to teach these limitations.

4J. Claim 68 requires, among other things, providing an information device, determining the location of the information device in a space and using a processor to automatically identify resources to be positioned at the location of the information device. Thus, for instance, an information device may include a hand held device with a display screen as an output device. Here, when a user moves the hand held device to a location within a facility space, the system automatically identifies resources to be positioned at the location.

While Dolin teaches an interface device, nothing in Dolin teaches or suggests determining the location of the information device or using a processor to automatically identify resources to be placed at the location. The Office Action cites sections of Dolin that teach determining locations of resources that communicate with each other, not the location of an information device followed by identifying resources to be placed at the location of the information device.

4K. Claim 71 requires that the information device includes a display and wherein the step of identifying the tags includes providing a list of the tags and the step of indicating one of the tags includes selecting one of the tags from the list. Thus, combining the claim 71 and 68 limitations, at a minimum, the claim requires determining the location of an information device that includes a display. The only device in Dolin

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that includes a display is the device that generates the electronic map and clearly Dolin fails to teach or suggest determining the location of that device.

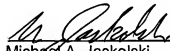
Applicant believes the amended claims recites patentable subject matter and allowance of the same is requested. No fee in addition to the fees already authorized in this and accompanying documentation is believed to be required to enter this amendment, however, if an additional fee is required, please charge Deposit Account No. 17-0055 in the amount of the fee.

Respectfully submitted,

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By:

  
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